

In the matter of RM-10620

This proposal for rule making should be summarily dismissed. The issues have all been adequately addressed by the Federal Communications Commission, FCC 99-412, in the case of WT Docket No. 98-143, REPORT AND ORDER, Adopted: December 22, 1999, Released: December 30, 1999, and FCC 01-108 in the case of WT Docket No. 98-143, RM-9148, RM-9150, RM-9196, RM-9831, RM-9867, RM-10018, MEMORANDUM OPINION AND ORDER, Adopted: March 27, 2001, Released: April 6, 2001.

I would like to quote Part 97.1(c) with some emphasis on a couple of words: "Encouragement and improvement of the amateur service through rules which provide for ADVANCING SKILLS in both the communication and technical phases of the art."

I believe the petitioner is attempting to convey a solution to a very real situation. People with Novice licenses are trapped (and always have been) in a license that provides them very little privileges to advance their skills in communication. Let's face it. We have already indicated by changes in the licensing structure that improving Morse Code proficiency is no longer necessary for advancing communication and technical skills. I would have been supportive for an expansion of the privileges for Novices but unfortunately the License as an entry point in the Amateur Radio Service has been eliminated.

The FCC has effectively conveyed to the people with Novice licenses that they are encouraged to improve and advance skills in communication and technical phases of the art. All they have to do is advance their technical skills the same as anyone else that would wish to obtain a Technician Class license. They are already ahead of the "No-code Techs" for advancing skills in Morse Code for the General Class.

The issue over the Advanced licenses is problematic. First, I think that the additional frequencies provided by the Amateur Extra class are really not worth the effort of making an argument. Just because someone has had a license for any length time doesn't indicate the level of "advancing skills in either of the communication and technical phases of the art." The petitioner does make a case for some method of providing credit to people with less than 15 years. The case is supported by suggesting merit for such things as M.A.R.S. or Commercial Radio Telephone Licenses. Why not education? What about that person that has a college degree in Electronics? What about that person that doesn't have a college degree but has a "Working Person's P.H.D."? My point is the proposal is not consensus building and probably can't receive wide acceptance from the Amateur community.

I am encouraged that the next phase of debate is occurring over the licensing structure. The petitioner has provided us the opportunity to review our thoughts on the matter. At this time, I believe that much more discussion is required on these issues and this specific proposal for rule making should be dismissed without further action at this time.